

1 Michael J. Gearin, WSBA # 20982
David C. Neu, WSBA # 33143
2 Brian T. Peterson, WSBA # 42088
K&L GATES LLP
3 925 Fourth Avenue, Suite 2900
Seattle, WA 98104-1158
4 (206) 623-7580
5
6
7

Honorable Christopher M. Alston
Chapter 11

8 UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 In re:

11 NORTHWEST TERRITORIAL MINT, LLC,
12 Debtor.

Case No. 16-11767-CMA

DECLARATION OF DENISE LENTZ
IN RESPONSE TO ORDER TO SHOW
CAUSE

13 I, Denise A. Lentz, hereby declare:
14

15 1. I am a Senior Paralegal at K&L Gates, LLP ("K&L Gates"). K&L Gates is counsel to
16 the Chapter 11 Trustee Mark Calvert in the above captioned case. I am over 18 years old, and I am
17 competent in all ways to testify. Unless otherwise stated, I make the following statements based on
18 my personal knowledge. I submit this Declaration in response to the Court's Order to Show Cause
19 (the "Show Cause Order") entered on July 6, 2018.

20 2. I coordinated K&L Gates' effort to review and produce emails responsive to the
21 Court's Show Cause Order. Paul Wagner managed the initial collection of Jenifer Baker's emails
22 responsive to the Show Cause Order and placed the emails he collected in a Dropbox folder that I
23 could access. The emails from the Dropbox folder were transferred onto my firm's computer system.
24 Thereafter, I conducted my own search of the saved emails. I searched for and reviewed emails that
25
26

DECLARATION OF DENISE A. LENTZ - 1

501690753 v4

K&L GATES LLP
925 FOURTH AVENUE
SUITE 2900
SEATTLE, WASHINGTON 98104-1158
TELEPHONE: (206) 623-7580
FACSIMILE: (206) 623-7022

1 did not constitute communications with coining die customers that related in any way to resolving
2 disputes over ownership interests in dies. I have personally expended more than twelve hours of time
3 in reviewing and preparing the responsive materials for production. I have enlisted the assistance of
4 additional staff from our electronic discovery group to facilitate my review and to prepare the
5 responsive materials for filing with the court and I am aware that that staff has devoted several hours
6 to the task.
7

8 3. The responsive emails, including attachments, amount to over 6,000 pages of
9 material. To the best of my knowledge, the responsive emails include all communications that were
10 contained in the universe of emails provided to me by Mr. Wagner from Jenifer Baker to any
11 customers and emails and other communications from any customers to Jenifer Baker, relating in
12 any way to resolving disputes over ownership of dies including the attachments to those emails.
13

14 4. K&L Gates staff and I also searched the responsive emails and attempted to locate
15 personally identifiable information of coining die customers. K&L Gates staff and myself have
16 caused all known personally identifiable information to be redacted.

17 5. Jenifer Baker's responsive emails, including attachments, that I collected and saved in
18 PDF form are attached hereto as Exhibits A through C.

19 I declare under penalty of perjury that the foregoing is true and correct to the best of my
20 knowledge and belief.
21

22 EXECUTED this 20th day of July, at Seattle, Washington.
23

24 /s/ Denise A. Lentz

25 Denise A. Lentz
26

DECLARATION OF DENISE A. LENTZ - 2

501690753 v4

K&L GATES LLP
925 FOURTH AVENUE
SUITE 2900
SEATTLE, WASHINGTON 98104-1158
TELEPHONE: (206) 623-7580
FACSIMILE: (206) 623-7022

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6

That she is a Paralegal in the law firm of K&L Gates LLP, and on July 20, 2018, she caused the foregoing document to be filed electronically through the CM/ECF system which caused Registered Participants to be served by electronic means, as fully reflected on the Notice of Electronic Filing.

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

Executed on the 20th day of July, 2018 at Seattle, Washington.

/s/ Denise A. Lentz.
Denise A. Lentz

501690753 v4

K&L GATES LLP
925 FOURTH AVENUE
SUITE 2900
SEATTLE, WASHINGTON 98104-1158
TELEPHONE: (206) 623-7580
FACSIMILE: (206) 623-7022